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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GALE SOSTEK; and HERB SOSTEK,
Plaintiff,
vs.
COUNTY OF SAN BERNARDINO;
SAMUEL FULLER; and DOES 2-10,
inclusive
Defendants.

Case No. 5:23-cv-02236-MRA-MRW
Hon. Mónica Ramírez Almadani

JOINT STIPULATION FOR ORDER EXTENDING DISCOVERY DEADLINES

[Proposed] Order *filed concurrently herewith*

IT IS HEREBY STIPULATED AND REQUESTED by and between the parties hereto, through their attorneys of record, as follows:

WHEREAS, pursuant to the Court's Order [Doc. # 50], the parties exchanged initial expert disclosures yesterday on October 7, 2024.

WHEREAS, the rebuttal expert disclosures and the expert discovery cut-off is currently October 21, 2024.

WHEREAS, the parties are scheduled to conduct mediation on October 22, 2024.

WHEREAS, the parties wish to conduct their mediation before incurring the additional substantial expenses associated with retaining rebuttal experts and with

1 taking the depositions of the respective experts.

2 WHEREAS, in order to promote the prospects for success of settlement
3 discussions and limit unnecessary expense, particularly as to the rebuttal expert
4 retention and the expert depositions, the parties request that the pending controlling
5 dates set forth in the Court's Scheduling Order be continued approximately two
6 weeks.

7 WHEREAS, there has been one prior requests for continuance or extension
8 regarding discovery.

9 WHEREAS, such request, if granted, would result in the following schedule:

11	<u>EVENT</u>	<u>CURRENT</u>	<u>PROPOSED</u>
12	Rebuttal Expert Disclosures:	10/21/24	10/28/24
13	Expert Discovery Cut Off:	10/21/24	11/04/24
14	Last Date to <u>Hear</u> Motions:	10/16/24	11/15/24
15	Last Date to <u>Hear</u> <i>Daubert</i> Motions:	11/13/24	12/13/24

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17 7. All other pre-trial and trial dates would remain in effect.

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3 IT IS SO STIPULATED AND REQUESTED.

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7 DATED: October 8, 2024

LAW OFFICES OF DALE K. GALIPO

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By /s/ Eric Valenzuela
Eric Valenzuela
Attorneys for Plaintiffs

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WESIERSKI & ZUREK LLP

DATED: October 8, 2024

By /s/ Michelle R. Prescott
Michelle R. Prescott
Attorneys for Defendants